

MEMO ENDORSED

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July 8, 2020

Via ECF and E-Mail

The Honorable William H. Pauley, III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application granted. Additionally, the conference scheduled for July 23, 2020 is adjourned to October 9, 2020 at 2:30 p.m.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

Re: *United States v. Kenneth Henderson*
13 Cr. 256 (WHP)

July 9, 2020

Dear Judge Pauley:

As Your Honor is aware, I am counsel to Mr. Kenneth Henderson in the above-referenced Violation of Supervised Release proceeding, appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. §3006A. This correspondence is to respectfully request the modification of Mr. Henderson's release conditions.

On March 20, 2020, the Court released Mr. Henderson under the conditions of home detention with GPS monitoring and, since then, he has complied with his conditions of release and has been in constant contact with counsel and Probation.

This application seeks the permanent modification of Mr. Henderson's release conditions, from home detention with GPS monitoring, to: (i) curfew enforced by GPS monitoring, with specific hours at the discretion of Probation; and (ii) travel restricted to the Southern and Eastern Districts of New York. We request the less restrictive conditions and increased flexibility so that Mr. Henderson will be able to seek employment; spend time with his children; and engage in substance abuse treatment.

Based upon my communications with A.U.S.A. Sarah Mortazavi and Probation Officer Washington Herrera, the Government takes no position while Probation consents to this request.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application modifying Mr. Henderson's bail conditions.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc: A.U.S.A. Sarah Mortazavi (via email)
Probation Officer Washington Herrera (via email)